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Attorneys for Plaintiffs
 ILLUMINA, INC. and ILLUMINA CAMBRIDGE LTD.

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF CALIFORNIA

ILLUMINA, INC. and ILLUMINA
 CAMBRIDGE LTD.,

Plaintiffs,

v.

COMPLETE GENOMICS, INC., and
 DOES 1-50, inclusive

Defendants.

CASE NO. 3:12-cv-01465-BEN-BGS

**PLAINTIFFS' ANSWER TO
 COUNTERCLAIMS OF COMPLETE
 GENOMICS, INC.**

JURY TRIAL DEMANDED

Courtroom:	3
Judge:	Hon. Roger T. Benitez
Magistrate Judge:	Hon. Bernard G. Skomal
Trial Date:	Not set

Plaintiffs Illumina, Inc. and Illumina Cambridge Ltd. (collectively "Illumina"), through
 their undersigned counsel, hereby answer the Counterclaims of Complete Genomics, Inc.
 ("Complete Genomics") dated July 9, 2012, as follows:

THE PARTIES

1. Admitted.

2. Admitted.

3. Admitted that Illumina Cambridge Ltd. is a corporation organized under the laws of the United Kingdom with its principal place of business at Chesterford Research Park, Little Chesterford, Nr Saffron Walden, Essex CB10 1XL, UK.

JURISDICTION AND VENUE

4. Admitted.

5. Admitted.

6. Admitted.

COUNT I

(Declaratory Judgment Regarding Non-Infringement of United States Patent No. 8,192,930)

7. Illumina repeats and realleges its responses to the allegations in paragraphs 1-6 as if fully restated herein.

8. Admitted.

9. Illumina admits that the Court has jurisdiction to declare whether the '930 patent is infringed by Complete Genomics and denies the remaining allegations of paragraph 9.

10. Illumina denies the allegations of paragraph 10, including the allegations adopted by reference in paragraphs 23-28 and 30-34 of Complete Genomics's Answer, except as indicated otherwise below:

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. Denied.

28. Denied.

30. Denied.

31. Denied.

32. Admitted that Complete Genomics utilizes "DNA nanoballs." Otherwise denied.

33. Denied.

34. Admitted that Complete Genomics utilizes a sequencing by ligation methodology. Otherwise denied.

COUNT II

(Declaratory Judgment Regarding Invalidity of United States Patent No. 8,192,930)

11. Illumina repeats and realleges its responses to the allegations in paragraphs 1-10 as if fully restated herein.

12. Admitted.

13. Illumina admits that the Court has jurisdiction to declare whether the '930 patent is invalid and denies the remaining allegations of paragraph 13.

14. Illumina denies the allegations of paragraph 14, including the allegations adopted by reference in paragraphs 35-44 of Complete Genomics's Answer, except as indicated otherwise below:

35. Denied.

36. Denied.

37. Denied.

38. Admitted that the quoted language appears in the '930 patent. Otherwise denied.

39. Admitted that the quoted language appears in the '930 patent. Otherwise denied.

40. Denied.

41. Denied.

42. Denied.

43. Denied.

44. Denied.

PRAYER FOR RELIEF

Illumina denies that Complete Genomics is entitled to any relief whatsoever, either as prayed for in its Counterclaims or otherwise.

JURY DEMAND

Illumina hereby demands a trial by jury on all issues and claims so triable.

Dated: July 30, 2012

PAUL, PLEVIN, SULLIVAN &
CONNAUGHTON LLP

By: /s/ E. Joseph Connaughton

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JEFFREY P. AMES
DANIELLE M. BLACKHALL
Attorneys for Plaintiffs
ILLUMINA, INC. and ILLUMINA
CAMBRIDGE LTD.

1 *Illumina, et al. v. Complete Genomics, Inc.*
USDC Southern District Case No. 3:12-cv-01465-BEN-BGS

2
3 **PROOF OF SERVICE**

4 I, the undersigned, hereby declare that I am over the age of eighteen years and not a party
to this action. I am employed, or am a resident of, the County of San Diego, California, and my
business address is: Paul, Plevin, Sullivan & Connaughton LLP, 401 B Street, Tenth Floor, San
5 Diego, California 92101.

6 On July 30, 2012, I caused to be served the following document(s):

- 7 • **PLAINTIFFS' ANSWER TO COUNTERCLAIMS OF COMPLETE GENOMICS,
INC.; JURY TRIAL DEMANDED**

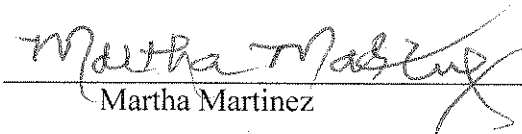
8 on the interested party (ies) in this action by placing a true copy thereof and addressed as follows:

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10 Sean Boyle
Marisa Armanino Williams
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Attorneys for Complete Genomics, Inc.

15 ☒ (By **ELECTRONIC SERVICE VIA CM/ECF SYSTEM**) In accordance with the
16 electronic filing procedures of this Court, service has been effected on the parties above,
whose counsel of record is a registered participant of CM/ECF, via electronic service
17 through the CM/ECF system.

18 I declare that I am employed by the office of a member of the bar of this court at whose
direction the service was made.

19 Executed July 30, 2012, at San Diego, California.

20
21 
22 Martha Martinez